

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**2022 U.S.-SOUTH AFRICA
COMBINATION FREQUENCY
ALLOCATION PROCEEDING**

Docket DOT-OST-2022-0050

**ANSWER OF THE UNITED MASTER EXECUTIVE COUNCIL
OF THE AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

Captain Mike Hamilton, Chairman
United Master Executive Council
Air Line Pilots Association, International
9550 West Higgins Road, Suite 1000
Rosemont, IL 60018
847-292-1700
Michael.Hamilton@alpa.org
Mary.O'Brien@alpa.org

May 18, 2022

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**2022 U.S.-SOUTH AFRICA
COMBINATION FREQUENCY
ALLOCATION PROCEEDING**

Docket DOT-OST-2022-0050

**ANSWER OF THE UNITED MASTER EXECUTIVE COUNCIL
OF THE AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

The United Master Executive Council of the Air Line Pilots Association, International (MEC) hereby files this Answer in strong support of United Airlines’ application for an allocation of three of the four available U.S.-South Africa frequencies to enable it to operate nonstop passenger and cargo service from Washington, D.C. to Cape Town, South Africa, as United set forth in the earlier docket, DOT-OST-2022-0022.

United’s proposed service will further the Department’s goal of maximizing “public benefits” (Order 2022-5-1, p. 3) in several ways. A Washington-South Africa service will restore a nonstop air link that was severed by the recent bankruptcy of South African Airways which operated to Washington Dulles for many years. Further, the Washington capital area market will be able to enjoy a convenient nonstop flight versus 21- to 30-hour travel times via domestic, European, or Middle Eastern connections.¹ Adding Washington Dulles-Cape Town flights will enhance consumer choice by supplementing United’s existing Cape Town service out of Newark, establishing a viable alternative to U.S. and foreign carriers with already comprehensive African networks. For Dulles customers, Cape Town service will strengthen United’s growing international network at Dulles and support the company’s hub investments

¹ Reflects OAG data and carrier websites for IAD-Cape Town flights on or about November 19, 2022.

there, such as the new Polaris business class lounge and a proposed new 14-gate concourse.²

Moreover, because United's nonstop service will operate on its own "U.S. metal," United's Washington service will be consistent with the spirit of the Fly America Act³ – an important policy goal for the Air Line Pilots Association – and will facilitate nonstop U.S. Government travel under the General Services Administration City Pair Program.⁴

From the perspective of United's 14,200 pilots, granting United's frequency request would offer additional opportunities to perform widebody flying as U.S. carriers' international operations are beginning to recover from the reductions related to the COVID-19 pandemic. As the Department is aware, widebody international flying represents the type of flying a senior, experienced pilot seeks at the pinnacle of his or her career, and it is the type of flying that encourages prospective pilots to aspire to the profession at a carrier which offers those opportunities. Since our fellow MEC has expressed its support for Delta Air Lines' application on similar grounds, a compromise solution by the Department of granting two frequencies to each carrier would provide both pilot groups those "brass ring" prospects. From the traveler's perspective, a compromise would also allow consumers in the Washington and Atlanta markets more air service opportunities to South Africa.

² Metro. Washington Airports Auth. Statement, Apr. 7, 2022, at <https://www.mwaa.com/news/dulles-international-airport-proposes-new-14-gate-concourse>.

³ Section 5 of the Int'l Air Transp. Fair Competitive Practices Act of 1974, codified at 49 U.S.C. § 40118.

⁴ <https://www.gsa.gov/travel/plan-book/transportation-airfare-pov-etc/city-pair-program-cpp>.

For all of the above reasons, the United MEC strongly supports United's proposal and asks the Department to act favorably on United's application.

Respectfully submitted,

/s Mike Hamilton

Captain Mike Hamilton Chairman
United Master Executive Council, Air
Line Pilots Association, International
9550 West Higgins Road, Suite 1000
Rosemont, IL 60018
847-292-1700
Michael.Hamilton@alpa.org
Mary.O'Brien@alpa.org

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2022, the foregoing document was served on the following persons via the email addresses listed below in accordance with the Department's Rules of Practice:

American Airlines:	robert.wirick@aa.com bruce.wark@aa.com
Delta Air Lines:	chris.walker@delta.com steven.seiden@delta.com
Hawaiian Airlines:	perkmann@cooley.com
United Airlines:	dan.weiss@united.com steve.morrissey@united.com amna.arshad@freshfields.com
Department of Transportation:	carol.petsonk@dot.gov benjamin.taylor@dot.gov brett.kruger@dot.gov robert.finamore@dot.gov todd.homan@dot.gov benjamin.taylor@dot.gov darren.jaffe@dot.gov
FAA:	rick.domingo@faa.gov
Department of State:	yoneokar@state.gov
Department of Commerce:	eugene.alford@trade.gov
Delta Master Executive Council, Air	Jason.Ambrosi@alpa.org
Line Pilots Association, Int'l:	Kathy.Hunt@alpra.org
Airline Info:	info@airlineinfo.com

/s Mary O'Brien

Mary O'Brien, Paralegal
United Master Executive Council